

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA §
§
vs. § CRIMINAL NO. 4:24-CR-580
[1] Francisco Jaramillo-Valdovinos, *et al.* §
§
Defendants. §

SECOND JOINT STATUS REPORT ON DISCOVERY

Pursuant to the Court's order dated February 7, 2025 (Docket No. 233), this joint status report is filed by the United States and Defendants [10] Asad Wali Kesaria, [12] Lorena Araquistain, [14] Victor Garcia-Cisneros, [16] Cliserio Najera-Valenzuela, [17] Marcos Pineda-Mendoza, [19] Abel Delgado-Rojas, [20] Rogelio Zuniga-Reyes, [21] Yonatan Duarte-Garcia, [22] Diego Macentyre-Rodriguez, [23] Andres Ramirez-Duarte, [24] Norberto Coronado-Mata, [25] Mayco Jaimes, [26] Marcos Antonio Zapata, [28] Kalle Robert Cort, [29] Jose Hernandez-Olvera, [30] Jesus Horacio Garza, [31] Enio Gonzalez-Barreto, [32] Brandy Nikoll Meadows, and [33] Othoniel Gonzalez II, by and through their respective counsel.

Procedural Background

On November 7, 2024, a sealed indictment was returned in this matter, charging 34 defendants in Count One with Conspiracy to Launder Monetary Instruments, in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1956(h). Several defendants were named on additional counts of Laundering Monetary Instruments, in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2, and/or Possession with Intent to Distribute Cocaine/Heroin/Alprazolam, in violation of 21 U.S.C. § 841(a) and (b).

Beginning on or about January 23, 2025, all but 11 defendants¹ were arrested on the pending charges and either retained or were appointed counsel.

The Court designated the case complex on February 7, 2025, and vacated all dates in the scheduling order. The Court ordered the parties to submit a joint status report on discovery every 90 days, beginning in May 2025. Doc. No. 233. The parties filed the first Status Report on May 9, 2025. Doc. No. 284.

Status of Discovery

To facilitate the dissemination of discovery in this complex, multi-defendant case, the Court appointed Russell M. Aoki of Aoki Law PLLC as the Coordinating Discovery Attorney on February 26, 2025. Docket No. 257. As stated in the May Status Report, Mr. Aoki disseminated the Government's first round of general discovery in April and May 2025.

The Government has since submitted a second round of general discovery to Mr. Aoki., consisting of approximately 713 GB of data. The Government shipped the material to Mr. Aoki on August 1, 2025. In the coming weeks, Mr. Aoki will make the discovery available to defense counsel.²

In addition to the general discovery that has been disseminated through Mr. Aoki, the Government made several defendant-specific productions in June, July, and August 2025. These

¹ The 11 fugitive defendants are: [1] Francisco Jaramillo-Valdovinos; [2] Angelberto Quezada-Mejia; [3] FNU LNU a/k/a "Horacio;" [4] Alejandro Olmeda-Rodriguez; [5] Joel Quezada-Reyes; [6] David Mejia-Quezada; [7] Jaime Hugo Sanchez; [8] Diego Gonzalez-Rosales; [13] Aguileo Duarte-Chavez; [15] Primo Hernandez-Garcia; and [18] Juan Contreras-Morales.

² As before, Mr. Aoki will ship drives containing the second round of general discovery to CJA-appointed counsel. Privately retained counsel will be able to ship their own drives to Mr. Aoki, which he will load with discovery and return to them.

productions were made to Defendants [9] Nabeel Iqbal and [10] Asad Kesaria, each of whom received terabytes of data each.

Conclusion

The discovery process in this complex, multi-defendant case remains ongoing. Once all discovery has been received, the defense will require time to review the discovery, to consider any plea offers from the Government, to decide whether to file any pretrial motions, and/or to prepare for trial.

The Government and all defense counsel listed in the Certificate of Conference below agree that no trial settings or trial-related deadlines should be imposed at this time. The parties will update the Court on the status of discovery no later than November 5, 2025.

Respectfully submitted,

NICHOLAS J. GANJEI
United States Attorney

By: /s/ Stephanie Bauman
Sherin S. Daniel
Stephanie Bauman
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CERTIFICATE OF CONFERENCE

I hereby certify that I attempted to confer with all defense counsel of record in this case. The counsel listed below have each approved this status report and authorized the filing of the status report as joint. Andrew Williams, counsel for [27] Alex Perez-Sanchez, requested to be removed from this filing because Mr. Perez-Sanchez has entered a guilty plea. I did not receive a response from three defense counsel.

Nathan Mays
Counsel for [10] Asad Wali Kesaria

Stephen St. Martin and Emmett Leeper
Counsel for [12] Lorena Araquistain

Lori Botello
Counsel for [14] Victor Garcia-Cisneros

Ali Fazel
Counsel for [16] Cliserio Najera-Valenzuela

David Adler
Counsel for [17] Marcos Pineda-Mendoza

Javier Martinez
Counsel for [19] Abel Delgado-Rojas

Mark Diaz
Counsel for [20] Rogelio Zuniga-Reyes

Erin Epley
Counsel for [21] Yonatan Duarte-Garcia

James Kennedy
Counsel for [22] Diego Macentyre-Rodriguez

David Bires
Counsel for [23] Andres Ramirez-Duarte

Eric Reed
Counsel for [24] Norberto Coronado

Molly Bagshaw
Counsel for [25] Mayco Jaimes

Adrian Almaguer
Counsel for [26] Marcos Antonio Zapata

Billy Morian and Reagen Thomas
Counsel for [28] Kalle Cort

Anuj Shah
Counsel for [29] Jose Hernandez-Olvera

Juan Guerra
Counsel for [30] Jesus Horacio Garza

Mario Madrid
Counsel for [31] Enio Gonzalez-Barreto

Paul Morgan
Counsel for [32] Brandy Meadows

Chip Lewis
Counsel for [33] Othoniel Gonzalez II

/s/ Stephanie Bauman
Stephanie Bauman
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing will be served on all counsel of record upon filing with ECF.

/s/ Stephanie Bauman
Stephanie Bauman
Assistant United States Attorney